

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN

In Re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter: 9

Case No. 13-53846

Judge: Hon. Thomas J. Tucker

Address: Two Woodward Avenue, Ste. 1126
Detroit, Michigan 48226

Employer's Tax ID#38-6004606

**OBJECTION TO CITY OF DETROIT'S EIGHTH
AMENDED PLAN FOR THE ADJUSTMENT OF DEBTS**

NOW COMES Claimant, RAINELL MURRAY, by and through her attorneys, RONALD J. GRICIUS, P.C. by RONALD J. GRICIUS, and for her Motion Objecting to the City of Detroit's Eighth Amended Plan for the Adjustment of Debts, states as follows:

1. That Claimant has a pending action in the Wayne County Circuit Court arising out of a motor vehicle accident wherein she suffered injuries entitling her to personal injury protection benefits.

2. That pursuant to the Michigan No-Fault Act, individuals sustaining injuries arising out of a motor vehicle incident are entitled to what is known as personal injury protection benefits, i.e. wage loss, reimbursement for loss of services, attendant care, and mileage per statute.

3. That a certificate of self-insurance (auto) requires that in the State of Michigan the entity, i.e. City of Detroit, must comply with all provisions of the Michigan No-Fault Insurance Act, the Financial Responsibility Act, and the Administrative Rules for No-Fault Insurers. Rule 257.532(e)(f)

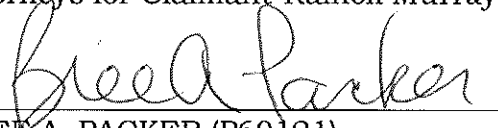
4. That pursuant to said Administrative Rules, Rule 257.536, a

self-insured is required to establish a fully funded loss reserve as described in said Rule.

5. That Claimant's claim, therefore, arising out of the Michigan No-Fault Act wherein her benefits would come out of the "fully funded loss reserve", her claim would not be part of this bankruptcy proceeding.

WHEREFORE, Claimant, RAINELL MURRAY's claim would not be classified as an unliquidated unsecured claim.

RONALD J. GRICIUS, P.C.
Attorneys for Claimant-Rainell Murray

BY: 
BREE A. PACKER (P60121)
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DATED: April 1, 2015

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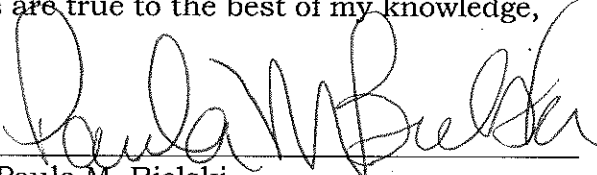
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PROOF OF SERVICE

I hereby certify that Claimant's Objection to City of Detroit's Eighth Amended Plan for the Adjustment of Debts was served on the attorneys of record via the electronic filing system on April 6, 2015.

I declare that the above statements are true to the best of my knowledge, information and belief.



Paula M. Bielski